

JUL 26 2016

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

§

vs.

§

CRIMINAL NO.

SANDRA MARTINEZ

§

B-16-660

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

On or about July 3, 2016, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

SANDRA MARTINEZ,

did knowingly and willfully conspire and agree with other persons known and unknown to the Grand Jurors to violate Title 8, United States Code, Section 1324(a)(1)(A)(ii), and (iii), that is, the object of their conspiracy and agreement was to transport and move and attempt to transport and move by means of a motor vehicle and conceal, harbor and shield from detection and attempt to conceal, harbor and shield from detection by means of a building and other means of transportation, an alien who had come to, entered, and remained in the United States, in violation of law, and in furtherance of said alien's illegal presence in the United States.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I).

COUNT TWO

On or about July 3, 2016, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

SANDRA MARTINEZ,

did encourage and induce a minor alien, namely, M.G.M.T., to come to, enter and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence in the United States would have been in violation of law.

In violation of Title 8, United States Code, Sections 1324(a)(1)(A)(iv) and 1324(a)(1)(B)(i).

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

KENNETH MAGIDSON
UNITED STATES ATTORNEY



DAVID CORONADO
Assistant United States Attorney